



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8EPR-N

AUG 8 2011

Mr. James Christian, Division Administrator
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Mr. John Njord, Executive Director
Utah Department of Transportation
4501 South 2700 West, Box 141245
Salt Lake City, UT 84114-8380

Re: Final Environmental Impact Statement,
Hyde Park to North Logan Transportation
Corridor (200 East): CEQ #:20110216

Dear Mr. Christian and Mr. Njord:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Hyde Park to North Logan Transportation Corridor (200 East) Final Environmental Impact Statement (EIS) prepared by the U.S. Federal Highway Administration (FHWA) and the Utah Department of Transportation (UDOT). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Project Background

The Purpose of this project is to provide a higher functioning continuous north-south corridor within the study area; improve mobility; enhance local and regional connectivity of Hyde Park, North Logan and neighboring communities; and support local economic development goals.

A Draft EIS was published in March 2007 for this project and federal, state, local agencies and the public provided comments. In the fall of 2008, the project was put on hold due to lack of funding. At that time, a preliminary Final EIS (dated 2008) had been drafted but had not been finalized for FHWA approval. The project resumed in 2010 and a reevaluation of the Draft EIS was prepared. The purpose of the written reevaluation was to determine if there had been changes to the project that resulted in additional impacts not already considered in the Draft EIS, which would require a Supplemental EIS or a new Draft EIS. On October 28, 2010, the FHWA concurred with the UDOT that the changes to the project would not result in additional impacts to those previously considered in the Draft EIS and that a Supplemental EIS was not required.

Updated material presented in the Final EIS includes:

- Alternative 3 Modified has been added as a Build Alternative.
- Impacts for all the alternatives have been updated based on changes such as SAFETEA-LU regulations, new air quality attainment status for the study area and changes to existing land use.
- The 2009 Cache Metropolitan Planning Organization (CMPO) travel demand model has been utilized for existing and design year 2040 traffic forecasts.
- The basis for the selection of the Preferred Alternative has been added.

The preferred alternative selected for this project corridor (Alternative 3 Modified) transitions west off of 200 East at approximately 2300 North and generally follows 150 East to 3700 North in Hyde Park. This selection was based on the results of the Section 4(f) least overall harm analysis, a comparison of impacts and benefits among alternatives, agency and public input and city council recommendations. Further, Alternative 3 Modified appears to impact fewer environmental resources in comparison to all other alternatives evaluated.

EPA concurs with the process followed by the FHWA and the UDOT that resulted in the preferred alternative selection. Our agency comments on this project and alternative are limited to concerns about wetland bank availability and air quality information, disclosure and mitigation.

Wetlands

It is not clear from our review of the Final EIS whether the Bear River Bottoms mitigation site will be available to the project proponent. Additionally, to our knowledge, this site has not been established yet, and as such, credits may not be available at the time of construction. We recommend that you clarify this information in the Record of Decision (ROD) for this project. The EPA requests that additional mitigation options be provided at the time of the 404 Permit Application, in compliance with the 2008 Mitigation for Losses of Aquatic Resources Final Rule. Any off-site mitigation or mitigation credits should be available at the time of construction so that there is no temporal loss to aquatic resources. Also, mitigation options should be provided to offset permanent impacts to the jurisdictional drainage and spring-fed stream that will be impacted by the project.

Air Quality

For future projects, we recommend including five years of State-certified National Ambient Air Quality Standard (NAAQS) monitoring data in the project vicinity, and disclose trends regarding the monitored ambient air quality data.

Regarding greenhouse gas (GHG) emissions and climate change, important climate change activities and information relevant to the project were not discussed in the Final EIS. Specifically, FHWA is working through the DOT Center for Climate Change and Environmental Forecasting to develop strategies to reduce transportation's contribution to GHGs, particularly

CO₂ emissions, and to assess the risks to transportation systems and services from climate change. In Utah, the Governor's Blue Ribbon Advisory Council on Climate Change (BRAC) identified measures that the State could take to minimize the impacts of transportation-related GHGs. The recommended measures include reducing vehicle mile traveled (VMT) through developing and encouraging the use of mass transit, ridesharing and telecommuting. Other strategies outlined in the BRAC report to reduce CO₂ at the source include promoting the use of low carbon fuels such as alternative fuels, bio-fuels and hybrid vehicles and vehicle technologies resulting in greater fuel efficiency, and implementing an idle reduction program for school busses and heavy duty trucks. We recommend that you consider adding this information into the ROD.

For future projects, we suggest that you describe the relationship of current and projected Utah highway CO₂ emissions to total global CO₂ emissions and the size of the project corridor relative to total Utah travel activity. An example of a NEPA analysis that included this information was the Bangerter West 600 DEIS.

As you develop an air monitoring plan for this project, we recommend a plan that evaluates the effectiveness of mitigation measures.

In the ROD, we recommend additional Best Management Practices (BMPs) outside of those found in the "UDOT 2008 Standard Specifications for Road and Bridge Construction." Some of these BMPs could include requiring heavy construction equipment to use the cleanest available engines or to be retrofitted with diesel particulate control; scheduling work outside of normal hours for sensitive receptors, such as construction immediately adjacent to a health care facility, church, outdoor playground or school; and using water or wetting agent to control dust. If you are interested, we would be glad to work with you to further develop suitable BMPs.

Thank you for the opportunity to comment on this document. If you have any questions, please contact Suzanne Bohan, Deputy Director of the NEPA Compliance and Review Program at (303) 312-6925 or you may contact Robin Coursen of her staff at (303) 312-6695.

Sincerely,



Carol L. Campbell
Assistant Regional Administrator
Office of Ecosystems Protection and Remediation

Enclosure

cc: Paul Ziman, FHWA Salt Lake City, UT
Kris Peterson, UDOT Region 1 Director

